

September 9, 1998

This document was submitted to EPA by a registrant in connection with EPA's evaluation of this chemical and it is presented here exactly as submitted.

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Asm 11/OPP#34136



March 26, 1996

**NALED REREGISTRATION:  
MEETING REGARDING  
NALED ECOLOGICAL RISK  
ASSESSMENT AND MITIGATION**

Case No.: 0092 Naled  
EPA Chemical No.: 034401  
EPA Company No.: 59639

Ms. Susan Jennings  
Office of Pesticide Programs, H7504C  
Document Processing Desk: DCI-SRRD-0092  
U.S. Environmental Protection Agency  
Room 266A, Crystal Mall 2  
1921 Jefferson Davis Highway  
Arlington, VA 22202

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JUL 29 1996  
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Dear Ms. Jennings:

Following is a summary of our meeting of March 12, 1996, held at Crystal Mall, Rm. 1026.

Attendees

Valent: Rick Stanton, Brent Solomon, Dan Fay  
EPA: Larry Schnaubelt (SR&RD), Susan Jennings (SR&RD), Mary Frankenberry (HED/EFED), Allen Vaughan (HED/EFED), Henry Nelson (HED/EFED), Siroos Mostaghimi (HED/EFED)

Label Use Pattern

Valent passed out a table (attached) summarizing agricultural uses for naled, reflecting currently labeled uses, as well as agreements-in-principle reached previously with SR&RD addressing worker exposure and residue issues. Differences from the registered label include a proposed rate reduction in almonds/peaches, and a proposed rate reduction on melons (amendment submitted to Registration Division). Valent explained that additional rate reductions were not practical for naled given its efficacy profile and short environmental half-life. Naled is a niche product, used where short residual is desired, and rate reductions would damage the product's market.

Aquatic Risk Characterization

Valent and EPA agree that surface water exposure modeling as currently practiced is inherently

conservative, and is designed as a screen to determine the need for risk mitigation and/or higher tier modeling. EPA's and Valent's EEC analyses do not differ substantially, and based on these results, EPA cannot conclude that naled poses no risk to aquatic invertebrates. It is unlikely that additional modeling will bring risk quotients (RQ's) below levels of concern, without some risk mitigation.

EFED will recalculate aquatic EECs using PRZM 2.3 as the basis for revised aquatic risk quotients. Earlier comments provided by Valent in June 1995 regarding EPA's initial EEC calculations will be considered in the new estimates. Valent will provide input files on diskette from the modeling runs submitted in June 1995.

#### Drift Mitigation

Valent and EPA agree that the majority of surface water loading predicted by EEC models results from drift. Therefore, drift reduction is a logical first step for risk mitigation.

Valent proposes establishing application buffer zones relative to natural water bodies, to reduce drift. Specific buffer zone proposals will be submitted to SR&RD within two week. Such proposals will be submitted with spray drift deposition data from Spray Drift Task Force studies. EPA will use such data in its future reevaluation of mitigation modeling. Finally, Valent will propose appropriate best management practice (BMP) language to promote drift reduction.

#### Runoff Mitigation

Valent believes that a restriction against applying within 24 hours before or after a forecasted or actual rainfall, as previously proposed, simply defines an already established BMP. Valent also maintains that this practice eliminates the majority of potential surface water loading contributed by runoff, and that this has been demonstrated with EEC models. This restriction was incorporated into modeling results submitted in June 1995.

Valent will provide SR&RD with results of modeling runs identical to those submitted in June 1995, without correcting for simultaneous application/rainfall events.

As requested by EPA, Valent agreed to consider expanding the application/rainfall restriction to 48 hours, and to consider a requirement for retention ponds associated with certain high risk uses/sites.

#### Monitoring/Modeling Effectiveness of Risk Mitigation

EPA proposed surface water monitoring to confirm that actual surface water residues, after implementation of agreed risk mitigation measures and BMPs, are not exceeding levels of concern. No specific protocol was mentioned, so details would be subject to negotiation between Valent and EPA. EPA indicated that site selection would probably target high risk uses/sites. If


results were negative (i.e. LOCs not exceeded), then such data would be considered protective of all other use/site combinations.

Valent expressed its concern that such a study would be expensive relative to the sales of naled, and the likelihood of obtaining meaningful results would be minimal given naled's short half-life, as demonstrated in particular by aquatic dissipation studies.

Valent proposed that modeling of mitigation measures to demonstrate reduction of risk below LOCs be considered as an alternative, or at least as an interim step, to imposition of surface water monitoring. EPA agreed to consider use of modeling as proposed, and to consider existing naled aquatic dissipation data (MRIDs 40494101, 40976401, 40976402, 41354107) in its determination of whether surface water monitoring would be required.

In conclusion, Valent appreciates the opportunity to provide input into the reregistration ecological risk assessment for naled, and to participate in an open dialogue which we trust will lead to a reasonable science-based decision allowing for continued naled use in a manner which is protective of the environment.

Sincerely,



Daniel P. Fay  
Project Manager  
Registration & Regulatory Affairs

Attachment

cc: B.A. Solomon  
R.H. Stanton

Mr. Robert Forrest  
Product Manager, PM Team 14  
Registration Division, EPA/OPP

Naled-10.pdf

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**Summary Table of Agricultural Uses for Dibrom (Naled) Insecticide (per re-registration discussions)  
March 12, 1996**

Use Site	Max. Rate (lbs ai/acre)	Max. No. Applic.	Min. Spray Interval (days)	Preharvest Interval (days)	Reentry Interval (days)	Applic. Method
Alfalfa Seed	1.4	3	7	n/a (non-food)	3	Air or ground
Almonds, Peaches	2.8	1 (dormant)	n/a	n/a (dormant)	3	Airblast
Celery	1.4	5	7	1	3	Air or ground
Chard, Spinach	1.4	5	7	2	3	Air (CA/AZ only) or ground
Citrus	1.875	3	7	7	3	Airblast or groundboom
Cole Crops	1.875	5	7	1	3	Air or ground
Cotton	0.938	5	7	>21	2	Air or ground
Eggplants, Peppers	1.875	3 @ 1.8 lbs. 6 @ 0.9 lb.	7	1	3	Air or ground
Grapes	0.938	6	7	3	2	Airblast (CA only) or groundboom
Melons	1.875	1 @ 1.8 lbs.* 2 @ 0.9 lb.	7	1	3	Air or ground
Peas, Beans	1.4	3	7	1	3	Air (CA only) or ground
Safflower (CA/AZ only)	0.7	3	7	30	2	Air or ground
Strawberries	0.938	5	7	1	2	Ground
Sugarbeets	0.938	5	7	2	2	Air or ground
Summer Squash	1.875	3 @ 1.8 lbs. 6 @ 0.9 lb.	7	1	3	Air or ground
Walnuts	1.875	2	7	10	3	Air (CA only) or ground
Rangeland	0.938	5	7	n/a		Air or ground

Label amendment submitted 3/96 to reduce maximum rate to 0.9 lb ai/acre for melon use